

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	(1) Documentation of Biosolids BMP	Audit Number:	01-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Wastewater O&M Supervisor)		
Audit date(s)	3/18/17		
List nonconformances:			
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Comments:			

"I have conducted an internal audit of the BMP element noted above."

Lead Auditor (MM/DD/YYYY)_03/_18/_2017_ signature: *D Harris*

Joint review with BMP coordinator: (MM/DD/YYYY) 3/21/17 Initials: WVH

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Table 16.1.1 – Internal Auditor's Minimum Question Checklist


Element 1 Documentation of BMP		Record audit number from worksheet:	01-2017-01
Requirement	Questions/Considerations	Auditor Notes	
Document the BMP for Biosolids in an BMP Manual or equivalent set of program documents that describe, at least at a general level, the applicable policies, programs, plans, procedures, and management practices in the BMP.	Can you show me your BMP manual?	Yes. The BMP manual are on the internet at on the City ESD Sharepoint site. It is also located on the public City of Grand Rapids website for public view at http://grcity.us/enterprise-services/Environment-Services/Pages/Biosolids-BMP.aspx	
Approve the BMP Manual by a level of the organization's management with the authority to commit people and resources to biosolids management activities.	Has your BMP manual been approved by the department Director?	Yes. The ESD Manager has reviewed and approved it.	
Contain, in the BMP Manual, the organization's Biosolids Management Policy and BMP Procedures required by the <i>BMP Elements</i> .	Can you show me your Biosolids Management Policy? Can you show me the elements of your policy identified in Table 1.1 of your BMP manual?	The BMP Management policy is specified in element 2 of the BMP manual. Yes. This is spelled out in table 1.1 in element 1.	
Contain or cross-reference, in the BMP Manual, public participation, communications, and emergency preparedness and response programs and plans required by the <i>BMP Elements</i> .	Can you show me some examples of how you have cross referenced public participation in your manual?	Yes. Elements 2,5,7 and 12 are reference with element 6.	
	Can you show me some examples of how you have cross referenced communications in your manual?	Yes. Elements 6 and 7 are cross reference with element 9.	
	Can you show me some examples of how you have cross referenced emergency preparedness and response programs and plans in your manual?	Yes. Element 12 is cross referenced with element 11 and references our spill plan SOP # 1114 for containment of spills.	
Cover, in the BMP Manual, all applicable, relevant, and selected critical control points for biosolids management activities throughout the biosolids value chain.	Were Critical Control Points, as identified in the Manual of Good Practice – Appendix F, for biosolids management activities throughout the biosolids value chain considered during program development?	Yes. In element 3.	
In the BMP Manual, include or cross-reference all operational controls, procedures, processes, and other management methods used to achieve and maintain compliance with legal and other requirements.	Can you provide examples showing how operational controls, procedures, processes, and other management methods used to achieve and maintain compliance with legal and other requirements are cross referenced in the BMP manual?	Yes. Elements 3, 4 and 10 reference the operational controls relative to the legal requirements of element 4.	
In the BMP Manual, describe those biosolids management activities assigned to and performed by contractors.	Does the BMP manual state which Biosolids management activities are assigned to contractors?	Yes. Table 7.1 in element 7.	
Contain in the BMP Manual must be documentation of support for the NBP letter of understanding.	Does the BMP Manual contain documentation of support for the NBP letter of understanding?	Yes. This is shown in element 1. (Letter of understanding).	
Accurately describe the process used by the facility to handle solids.	Have fundamental changes been made to the solids handling process that need to be reflected in the process description in this Element?	Yes. Changes have been made in the past when critical control points are changed or new CCP's come to be. It is current as of our last external (10 year platinum recertification audit).	

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	(2) Biosolids Management Policy	Audit Number:	02-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Wastewater O&M Supervisor)		
Audit date(s)	3/18/17		
List nonconformances:	1. 2. 3. 4. 5. 6.		
Comments:			

"I have conducted an internal audit of the BMP element noted above."

Lead Auditor (MM/DD/YYYY)_03/_18/_2017_ signature: 

Joint review with BMP coordinator: (MM/DD/YYYY) 3/21/17 Initials: 

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Table 16.1.2 – Internal Auditor's Minimum Question Checklist

Element 2 Biosolids Management Policy		Record audit number from worksheet:	02-2017-01
Requirement	Questions/Considerations	Auditor Notes	
Establish a Biosolids Management Policy that commits the organization to following the principles of conduct set forth in the Code of Good Practice and may include other biosolids commitments the organization voluntarily chooses to adopt.	Does the BMP commit our organization to the "Code of Good Practice"?	Yes, in element 2 by our mission statement.	
Communicate the policy to employees, contractors, and all interested parties.	Can you show me how the biosolids management policy was communicated to employees, contractors, and interested parties?	Yes, in element 8 (training). BMP awareness and refresher training is kept in the BMP files in the BMP Coordinator's office as well as electronically on the ESD Sharepoint site. This is done for all WRRF and Sewer Maintenance employees as well as the Cordes Inc employees who haul Biosolids to landfill.	
Incorporate the policy into the organization's biosolids programs, procedures, and practices.	Can you show me some examples of how the biosolids management policy has been incorporated into programs, procedures, and practices?	There are standard operating procedures that are linked to the critical control points located in element 3. This is also done in element 5 with goal setting and tracking.	
Maintain a pretreatment program consistent with state and federal regulations identified in the NPDES permit.	Can you show an SOP used to insure compliance with a state or federal regulation?	Yes. SOP 3102 directs operators on the responsibilities of personal at the Market Avenue Retention Basin (MARB) with regards to our NPDES permit at that location. The SOP instructs plant staff in order to maintain the permit requirements for discharge to the Grand River at that location.	
Monitor mercury in the plant influent and effluent and maintain existing pollutant minimization plan (PMP) practices and procedures identified in the NPDES permit.	Can you show me results from your mercury monitoring of the plant influent or effluent?	Yes. The IPP annual report 2016 in the ESD (U-Drive) under IPP – Annual Reports. The report is done annually around April 1 of the current year for the previous year. It is to be finalized by Kurt Anderson in IPP.	
Develop contract dewatering specifications and contracts which emphasize product handling and final disposal.	Can you show me language in your dewatering specifications which emphasizes product handling and final disposal?	Yes. This information is located in the GVRBA Joint Operating Agreement. The City of Grand Rapids WRRF has been the sole contractor for dewatering of Biosolids for the Grand Rapids facility. Grand Rapids staff operates the solids handling facility for GVRBA. There are also landfill, trucking, carbon and polymer contracts to supplement the GR operational portion.	

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	(3) Critical Control Points	Audit Number:	03-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Wastewater O&M Supervisor)		
Audit date(s)	3/12/17 <u>3/21/17</u>		
List nonconformances:			
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Comments:			

"I have conducted an internal audit of the BMP element noted above."

Lead Auditor (MM/DD/YYYY)_03/_21/_2017_ signature: *D Harris*

Joint review with BMP coordinator: (MM/DD/YYYY) 3/21/17 Initials: *WH*

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Table 16.1.3 – Internal Auditor's Minimum Question Checklist

Element 3 Critical Control Points		Record audit number from worksheet:	03-2017-01
Requirement	Questions/Considerations	Auditor Notes	
Identify and document the critical control points of the organization's biosolids management activities throughout the biosolids value chain, consistent with those identified in the National Manual of Good Practice and other authoritative sources.	Was Appendix F in the Manual of Good Practice considered when identifying your critical control points? Were all critical control points identified in Appendix F which were applicable to our operation implemented in our BMP?	Yes, in table 3.1 in element 3. Yes. Appendix F identifies critical control points that are applicable to our Biosolids Management Program.	
Identify potential or actual environmental impacts at each critical control point.	Have potential or actual environmental impacts for each critical control point been identified? Is the list complete?	Yes. They are addressed in element 3. Yes.	
Keep up-to-date information on the organization's critical control points.	Is up to date information maintained on Critical Control Points?	Yes. Information is up to date.	
Maintain records that link each critical control point and its potential environmental impacts with the corresponding operational controls.	Are records maintained which link critical control points, environmental impacts, and operational controls?	Yes. Monitoring and measurement. An example would be WAS Thickening. Thickened WAS % TS, centrate TSS and Feed TSS are analyzed and monitored. Data goes into database. Solids concentrations are run daily by the laboratory.	
For organizations that have successfully completed a third party verification audit, provide notification to the NBP (and assigned third-party verification auditor) following any operational change that requires a change to the identified critical control points or environmental impacts associated with the critical control points.	Have you had any operational changes that required a change to the identified critical control points or environmental impacts associated with the critical control points?	No. No changes have been necessary since last external (10) year audit. Since the last internal audit, WAS thickening SOP's 3350 and 3351 were completed by T. Dryer (WOMS). Composting is still listed as a CCP in our BMP; however it currently is not being used. All Grand Rapids Biosolids currently go to landfill.	

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	(4) Legal and Other Requirements	Audit Number:	04-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Wastewater O&M Supervisor)		
Audit date(s)	3/12/17 <u>3/21/17</u>		
List nonconformances:			
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Comments:			

"I have conducted an internal audit of the BMP element noted above."

Lead Auditor (MM/DD/YYYY)_03/_21/_2017_ signature: 

Joint review with BMP coordinator: (MM/DD/YYYY) 3/21/17 Initials: UHL

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Table 16.1.4 – Internal Auditor’s Minimum Question Checklist

[illegible]

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	(5) Goals & Objectives	Audit Number:	05-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Wastewater O&M Supervisor)		
Audit date(s)	3/25/17		
List nonconformances: 1. 2. 3. 4. 5. 6.			
Comments:			

"I have conducted an internal audit of the BMP element noted above."

Lead Auditor (MM/DD/YYYY)_03/_25/_2017_ signature: 

Joint review with BMP coordinator: (MM/DD/YYYY) 3/26/17 Initials: WPH

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Table 16.1.5 – Internal Auditor's Minimum Question Checklist

Element 5 Goals and Objectives		Record audit number from worksheet: 05-2017-01
Requirement	Questions/Considerations	Auditor Notes
Establish and periodically review measurable biosolids program goals and objectives for biosolids management activities.	Are goals and objectives established? Are goals and objectives periodically reviewed? Do they support the four NBP outcome areas?	Goals for 2016 were established 4/11/16 per the BMP files; however there were no progress reports. This was reviewed in our external recertification audit in October of 2016.
Reflect, in program goals and objectives, identified priorities for improving environmental performance of biosolids management activities based on critical control points, identified or potential environmental impacts, legal and other requirements, and applicable best management practices as defined in the National Manual of Good Practice and various authoritative sources on biosolids management (e.g., Water Environment Federation Manuals of Practice).	Do the goals and objectives identified in table 5.1 reflect a commitment on the part of the City to improving the environment or biosolids quality?	Yes. Goals reflected this.
Consider, in developing program goals and objectives, input from interested parties developed through proactive public participation.	Is there evidence that input from interested parties was considered in developing goals and objectives?	Yes. Interested parties were notified. No public response was received.
Integrate goals and objectives with other elements of the BMP and biosolids management activities.	Are goals and objectives integrated with other elements of the BMP?	Yes. Goals are integrated in our BMP, particularly in elements 6, 9, 10, 15 and 17. They are also reviewed in our internal audit (element 16) as well as during our external audits.
Develop program goals and objectives using SMART criteria (I.e., be Specific, Measurable, Achievable, Relevant, and Time-bounded).	Is there evidence that a SMART criterion was used to select goals and objectives? Does each goal and objective meet SMART criteria requirements?	SMART form 5.3 was filled out by the BMP Coordinator and are located in the BMP folders with the three goals for 2016. This form assures our goals meet the criteria related to Biosolids and the critical control points.
Update program goals and objectives on a regular basis.	Are goals and objectives regularly updated?	One of the three goals were SOP's that were constructed for the Thickened Waste start up and shutdown procedures. This was done quickly and did not require progress reports. The other two goals did not have reports done, but the data is monitored in SCADA. This was reviewed with the auditor in October of 2016 during our 10 th recertification audit.
Establish an action plan that describes those improvement activities it is pursuing to achieve biosolids program goals and objectives. Designate, in the action plan, schedules, milestones, resources, and responsibilities for achieving biosolids program goals and objectives.	Are action plans in place for each goal? Does each action plan contain schedules, milestones, resources, and responsibilities to achieve the objectives?	No. No action plans could be found in the BMP file. This was addressed and corrected during our external audit.

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Table 16.1 Internal Auditor's Worksheet'

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	(6) Public Participation in Planning	Audit Number:	06-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Wastewater O&M Supervisor)		
Audit date(s)	3/24/17		
List nonconformances:			
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Comments:			

"I have conducted an internal audit of the BMP element noted above."

Lead Auditor (MM/DD/YYYY)_03/_24/_2017_ signature: [Signature]

Joint review with BMP coordinator: (MM/DD/YYYY) ____/____/____ Initials: _____

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Table 16.1.6 – Internal Auditor's Minimum Question Checklist

Element 6 - Public Participation in Planning		Record audit number from worksheet:	06-2017-01
Requirement	Questions/Considerations	Auditor Notes	
Select and implement a proactive public participation approach to involve interested parties in its Biosolids Management Program and BMP planning process.	Is there evidence that a proactive process was selected and implemented to seek public participation near the beginning of the BMP planning process?	Yes. This is addressed in element 6 of the BMP. A list of interested parties is notified and asked to participate if they so desire. The interested parties are reviewed each year and contacts are updated as interested parties change or are added to the list of interested parties.	
Reflect, in the selected approach, the organization's commitments to the ten principles in the Code of Good Practice, including a plan for independent third-party verification of conformance with the BMP Elements.	Does element 6 commit the City to the Code of Good Practice? Does element 6 include information on the third party verification audit?	Yes. This is mentioned in element 6 of the BMP manual.	
Select an approach that is consistent with the degree of current public interest, history of public involvement, method of biosolids management, and related local circumstances.	Is the City's approach to public participation consistent with the degree of current public interest in the City's biosolids program?	Yes. Public request for information form in element 9. Form 5.2 is also used with regard to information from interested parties.	
Provide interested parties with meaningful opportunities to express views and perspectives relative to biosolids management activities, including concerns about environmental impacts, biosolids program performance, and potential areas for improvement.	Were opportunities provided for interested parties to provide input into the BMP? Did it include environmental impacts? Did it include biosolids program performance? Did it include potential areas for improvement?	Yes; Form 5.2 is sent to our interested parties with a list of potential goals. This is done prior to implementation of those goals. This help us assist in prioritizing those goals. Yes. Yes. Yes.	
Consider input from interested parties in initially developing program goals and objectives during BMP implementation and in updating them as part of periodic review of biosolids management program performance.	Did the City consider input from interested parties when initially developing its program goals and objectives? Did the City consider input from interested parties when updating them as part of its periodic review of biosolids management program performance?	Yes. This is kept in a folder for element 6 under "Public Participation in Planning." Yes. A folder is kept in the BMP files with relation to goals for each year.	
The City will maintain information related to the Biosolids management program and processes on the City's internet website.	Can you show the Biosolids information on your website?	Yes. It is located for the public to view on the website... http://grcity.us/enterprise-services/Environment-Services/Pages/Biosolids-BMP.aspx It is also located on the City of Grand Rapids Sharepoint Site on the ESD location for City employees to view.	
The City offers plant tours which can be customized to meet the needs of the group.	Can you show how information relating to Biosolids is communicated during plant tours?	Yes. The WRRF explains the value of Biosolids during tours and presentations. Methane recovery for beneficial reuse is explained to citizens, students, and other interested parties during tours.	
Records will be maintained to document the City's responsiveness to public input and requests for information regarding the BMP.	Can you show your records in regard to public input?	Yes. A "Request for Information" Folder is kept in the BMP files.	
A list of interested parties must be created.	Can you show your up to date list of interested parties?	Yes. There is a list of interested parties that is a portion of element 6 in the BMP Manual. This list is updated when the City becomes aware of changes so that the element can be updated when needed.	

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	(7) Roles & Responsibilities	Audit Number:	07-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Wastewater O&M Supervisor)		
Audit date(s)	3/25/17		
List nonconformances:			
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Comments:			

"I have conducted an internal audit of the BMP element noted above."

Lead Auditor (MM/DD/YYYY)_03/_25/_2017_ signature: 

Joint review with BMP coordinator: (MM/DD/YYYY) 3/24/17 Initials: WPH

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Table 16.1.7 – Internal Auditor's Minimum Question Checklist

Element 7 - Roles and Responsibilities		Record audit number from worksheet: 07-2017-01
Requirement	Questions/Considerations	Auditor Notes
Establish and maintain records of the assigned roles and responsibilities for the Biosolids Management Program and activities. These records shall define and document roles and responsibilities of employees for performing biosolids management activities and BMP functions.	Can you show examples of how responsibilities have been assigned for the BMP?	Element 7 defines the parties that are responsible for the internal BMP team. The tables in element 7 identify the responsible parties for each critical control point.
Appoint an individual with overall responsibility for ensuring that Biosolids Management Program and BMP are implemented and maintained.	Has an BMP coordinator who has overall responsibility for the BMP been assigned?	Yes. Bill Kaiser is the City of Grand Rapids WRRF Biosolids Program Coordinator. Bill has had responsibility for the program since November of 2015. He has conducted the 2015 and 2016 external audits.
Provide the human, technical, and financial resources necessary to effectively execute these responsibilities.	Can you provide evidence of adequate staffing to carry out assigned responsibilities? Can you provide evidence of adequate maintenance and instrumentation services to carry out assigned responsibilities? Can you provide evidence of adequate financial resources to effectively execute these responsibilities?	Yes. The organizational chart for the department is located on the ESD Sharepoint site under the BMP heading. It is also on the public website. Yes. Our computerized monitoring maintenance system is tracked in Maximo. Yes. Approved ESD and GVRBA budgets.
Define and document the roles and responsibilities of contractors retained to perform various biosolids management activities and BMP functions through Service Agreements.	Have roles and responsibilities of contractors been defined in their service agreements?	Yes. The contractor critical control points are outlined in the contract documents and bid specifications. Participation and responsibility with the BMP is a requirement of the contractor.
The organizational chart shown in Figure 7.1 shows the reporting structure in place at the Grand Rapids facility.	Is your organizational chart up to date?	Yes. The organizational chart has been updated as of the ninth interim audit. With the City's transformation efforts to be more sustainable; the organizational chart has been updated several times over the last few years.
The contractor is responsible for following policies and procedures they develop which are necessary to ensure that operations are conducted in a safe and environmentally sound manner.	Is your contractor prepared to respond to emergency situations? Does your contractor have a safety program?	Yes. The contractor has a spill plan in place. The control copy is kept in a manual at Cordes Ince. facility. Drivers each have SOP copies including the spill plan in each vehicle.

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: Conformance <u>Nonconformance</u>	
Element No.	8 - Training	Audit Number:	08-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Nicole Pasch – Environmental Assessment Supervisor (EAS)		
Audit date(s)	March 17, 2017 – March 22, 2017		
<p>List nonconformances:</p> <ol style="list-style-type: none">11 staff missed training, as noted on the "ESD Employee List June 2015" column "2016 BMP Training"Staff is missing from the "ESD Employee List June 2015"			
<p>Comments: Reviewing the training documentation was difficult in the online format. Each year had a unique file folder in SharePoint, with the exception of 2016. 2016 was added to the 2015 document within the 2015 folder. 2016 training was an added column to the 2015 document. I was finally able to identify it using last changed information. Using the paper copies as compared to the 2016 year end staffing info that I had from our payroll representative, I found 14 having missed training, not including vacant positions at year end or O&M Managers. A period of time reasonable for training to have occurred; i.e. "2016 BMP Training Jan-Oct 31" as, we will have new staff up to the end of the year that will make it difficult to have "everyone" accounted for in training during the calendar year end time may be more clear and provide more attainable expectations. Otherwise, more effort must go into 4th quarter calendar year.</p>			

"I have conducted an internal audit of the BMP element noted above."

Lead Auditor (MM/DD/YYYY) 3/20/17 signature: Nicole Pasch

Joint review with BMP coordinator: (MM/DD/YYYY) 3/21/17 Initials: WMM

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Table 16.1.8 – Internal Auditor’s Minimum Question Checklist

[illegible]

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	9 – Communication and Public Outreach	Audit Number:	09-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Nicole Pasch – Environmental Assessment Supervisor (EAS)		
Audit date(s)	March 17, 2017 – March 22, 2017		
List nonconformances: 1. 2. 3. 4. 5. 6. 7.			
Comments: The library of documents presented on the website is much more orderly and much easier to identify information than in the past, the organization is appreciated.			

"I have conducted an internal audit of the BMP element noted above."

Lead Auditor (MM/DD/YYYY) 3/20/17 signature: Nicole Pasch

Joint review with BMP coordinator: (MM/DD/YYYY) 3/21/17 Initials: WMM

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Table 16.1.9 – Internal Auditor's Minimum Question Checklist

Element 9 Communication and Public Outreach		Record audit number from worksheet:
Requirement	Questions/Considerations	Auditor Notes
Establish and maintain a proactive Communications Program that provides ongoing information about the Biosolids Management Program and BMP to interested parties and the public, consistent with local circumstances, the method of biosolids management, public communications history, and degree of current interest in its Biosolids management activities.	How is information about the BMP communicated to employees and other interested parties?	Information about the BMP is communicated through BMP training to ESD employees and BMP Contractors. BMP information is also available to all ESD and City employees on the ESD Sharepoint site. Additionally, BMP information is on the City of Grand Rapids' website - http://grcity.us/enterprise-services/Environment-Services/Pages/Biosolids-BMP.aspx , making it accessible to everyone. Information about our BMP is also communicated during plant tours and other public outreach events staffed by ESD employees. BMP Operating Information is communicated at the monthly ESD Staff Meeting, the BMP Management Team meetings, as well as the regular OMG meetings. Status of goals, objectives, non-conformances, action plans, etc. are discussed.
Include a procedure for receiving inquiries and requests for information from interested parties about its biosolids management activities and BMP. The procedure shall define a process for assuring a timely and complete response to inquiries by interested parties.	How can interested parties request information about the City's BMP? How do you assure that information is provided promptly? How do you track requests for information?	Interested parties can contact the City of Grand Rapids, through the 311 Customer Service team, by dialing 3-1-1 from a Grand Rapids phone line, or 616-456-3000 from anywhere. The e-mail customerservice@grcity.us is maintained by that team. The ESD Facebook page is maintained by ESD staff and is another avenue for contacting the Department. On the website is a comment form that can be completed; http://grcity.us/enterprise-services/Environment-Services/Pages/Biosolids-EMS-Participation-Form.aspx . Public Requests for Information through 3-1-1 are tracked in the crm software that has service messages established with workflows and alerts to management if not attended to within set time frames (48 business hours). Emergency needs would be conveyed to staff through both the service message and a phone call. The Facebook page has 5 or more administrators that can review and respond to messages. Most inquiries are responded to during normal business hours; however, if a message is urgent, an administrator will respond. Administrators have the Facebook application on their phones and alerts are sent when messages are received to the public page. The public comment/suggestion Form provides an opportunity for individuals to indicate if they would like to receive future e-mails related to the ESD's BMP program. E-mail alerts are sent to the BMP Coordinator and designated staff members, notifying them a submission has been made requiring review and potentially response required. : A Public Request for Information Form, part of Element 9, is completed by the ESD employee who received the inquiry. All Public Request for Information Forms are filed by year and retained in the BMP Coordinator's office..
At a minimum, make the following information about the organization's Biosolids management program and activities available to interested parties: a) the Biosolids Management Policy; b) applicable legal and other requirements; c) biosolids program goals and objectives for continual improvement; d) the periodic Biosolids Management Program Performance Report; and e) a detailed report of the independent, third party BMP verification audit results.	Is the Biosolids Management Policy available to interested parties? Are legal and other requirements available to interested parties? Are goals and objectives available to interested parties? Is the periodic biosolids management program performance report available to interested parties? Is third party audit and verification audit results available to interested parties?	The Biosolids Management Policy is available on the City's website – grcity.us The legal and other requirements are available to everyone on the City's website – grcity.us The goals and objectives are available to everyone on the City's website – grcity.us The periodic BMP Performance Reports are on the City's website – grcity.us Third party audits, (and Internal Audits), are available on the City's website – grcity.us Additionally, information will be distributed when requests are received.
Define roles and responsibilities of outside contractors in the Communications Program.	Is there evidence of how contractors are to handle requests for information in element 9?	Element 9 specifies contractors are to "directly respond to information requests from their own employees. Contractors will direct other requests for information to the WPS(WRRF Plant Superintendent) who will provide a response"
Communicate relevant information about biosolids management activities and the Biosolids Management Policy, and all seventeen elements of the BMP to employees and outside contractors, consistent with assigned roles and responsibilities.	Is there evidence that information about the BMP is communicated to employees and contractors?	Yes. All BMP training tracked by the BMP Coordinator and attendance forms for all BMP training sessions are maintained and kept on file.
Completion of Public Request for Information Form each time information is sent to the public.	Review Public Request for Information Forms completed in the last year for completeness.	There were no Public Request for Information Forms completed in the last year.

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Auditors Worksheet		Circle one: Conformance <u>Nonconformance</u>	
Element No.	10 – Operational Controls of Critical Control Points	Audit Number:	10-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Nicole Pasch – Environmental Assessment Supervisor (EAS)		
Audit date(s)	March 17, 2017 – March 22, 2017		
<p>List nonconformances:</p> <p>1. Three of Four Contractor Inspections were completed, 4th Quarter was not done.</p> <p>2.</p> <p>3.</p> <p>4.</p> <p>5.</p> <p>6.</p> <p>7.</p>			
<p>Comments: In the future, I would not recommend counting 6/28/2016 as 3rd quarter, even if you state that it is being done as "July." Dates are very specific, especially related to compliance.</p>			

"I have conducted an internal audit of the BMP element noted above."

Lead Auditor (MM/DD/YYYY) 3 / 20 / 17 signature: Nicole Pasch

Joint review with BMP coordinator: (MM/DD/YYYY) 3 / 21 / 17 Initials: WPK

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Table 16.1.10 – Internal Auditor’s Minimum Question Checklist

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Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	11- Emergency Preparedness & Response	Audit Number:	11-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Nicole Pasch – Environmental Assessment Supervisor (EAS)		
Audit date(s)	March 17, 2017 – March 22, 2017		
List nonconformances: 1. 2. 3. 4. 5. 6.			
Comments: The contractor's spill response plan quarterly reviews are not stored in an accessible location for audit.			

"I have conducted an internal audit of the BMP element noted above."

Lead Auditor (MM/DD/YYYY) 3/20/17 signature: Nicole Pasch

Joint review with BMP coordinator: (MM/DD/YYYY) 3/21/17 Initials: WRH

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Table 16.1.11 – Internal Auditor’s Minimum Question Checklist

[illegible]

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Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	12 – Documentation & Document Control	Audit Number:	12-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Nicole Pasch – Environmental Assessment Supervisor (EAS)		
Audit date(s)	March 17, 2017 – March 22, 2017		
List nonconformances: 1. 2. 3. 4. 5. 6. 7.			
Comments: SOPs overall should be reviewed for name change from The Grand Rapids Wastewater Treatment Plant (WWTP) to The Grand Rapids Water Resource Recovery Facility (WRRF). The contractor's document control plan quarterly reviews are not stored in an accessible location for audit.			

"I have conducted an internal audit of the BMP element noted above."

Lead Auditor (MM/DD/YYYY) 3/20/17 signature: Nicole Pasch

Joint review with BMP coordinator: (MM/DD/YYYY) 3/21/17 Initials: WRK

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Table 16.1.12 – Internal Auditor’s Minimum Question Checklist

[illegible]

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: Conformance <u>Nonconformance</u>	
Element No.	13-2017-01	Audit Number:	01
Provide lead auditor first followed by auditor assistants along with classifications	Carrie Rivette – Wastewater / Stormwater Maintenance Superintendent		
Audit date(s)	March 21 – 28, 2017		
List nonconformances: 1. CCP and legal review forms were not all completely filled out. 2. Phosphorus loading goal does not appear to have been addressed. 3. 4. 5. 6. 7.			
Comments: Given that most of the CCP and legal review forms were incompletely, Element 13 is not in conformance.			

"I have conducted an internal audit of the BMP element noted above."

Lead Auditor (MM/DD/YYYY) 3/30/17 signature: Carrie Rivette

Joint review with BMP coordinator: (MM/DD/YYYY) 3/30/17 Initials: WRH

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Table 16.1.13 – Internal Auditor's Minimum Question Checklist

Element 13 Monitoring and Measurement		Record audit number from worksheet: 13-2017-01
Requirement	Questions/Considerations	Auditor Notes
Establish and maintain regular monitoring and measurement procedures and practices for all biosolids management activities to assure compliance with applicable legal and other requirements, measure biosolids program performance at critical control points, and track progress toward achieving program goals and objectives.	Are procedures in place to conduct regular monitoring and measurement practices for all Biosolids management activities?	CCPs – With the exception of Significant Industrial Users, Commercial User Discharges, Discharge Authorization Permits, and Pollutant minimization, "no changes needed" is not checked and there is no information under "Verify that monitoring and measurement data is being recorded." Legal – No notes under Monitoring and Measurement data review for 1,5,6,7,9,11, and 12 Goals - Cannot find action plan status worksheet for Reducing the amount of Phosphorus loading to the secondary treatment process.
Record monitoring and measurement results and maintain records as established in the record keeping procedures under Element 12.	Provide examples of monitoring and measurement data?	Discharge authorization permit data includes sampling and inspection.
Require contractors to establish and maintain regular monitoring and measurement procedures and practices for all their assigned biosolids management activities, as defined in their service agreement.	Have contractors implemented regular monitoring and measurement procedures for activities they are responsible for? Provide example data?	Monitoring and measurement not indicated on contractor CCP reviews.
Require responsible supervisor to create action plan for each objective they are assigned under element 7.	Is there an action plan for each objective? Was it created by the assigned supervisor? Has each objective been assigned to a supervisor? Are the roles of the appropriate supervisor and/or contractor spelled out in element 7, "Roles and Responsibilities"?	Yes.
At a minimum, each action plan must meet contain: (a) schedule, (b) milestones, (c) resources required, (d) human resources required and their responsibilities.	Does each action plan contain: (a) schedule, (b) milestones, (c) resources required, (d) human resources required and their responsibilities?	Yes.
Appropriate Supervisor to submit a Progress Report, which will contain "Action Plan – Quarterly Progress Report" (see figure 13.1) and the "Action Plan Status Worksheet" (see figure 5.1) to the BMP coordinator within 30 days following the end of the calendar quarter for each objective.	Has a complete Progress Report been submitted within 30 days of the end of each calendar quarter for each objective? Are the roles of the appropriate supervisor and/or contractor spelled out in element 7, "Roles and Responsibilities"?	Yes.
Require "Action Plan – Quarterly Report" to contain activities that took place during the previous calendar quarter and any planned activities for the future.	Does "Action Plan – Quarterly Report" contain activities that took place during the previous calendar quarter and any planned activities for the future?	Not sure if previous data is included.
Require "Action Plan Status Worksheet" to reflect any changes in the "Action Plan" as per "plan, do, check, act" policy or any other techniques used to assess performance warrant. The document revision date shall reflect changes made in policy.	Was "Action Plan" modified appropriately per items included in "Action Plan Status Worksheet" and/or "Action Plan – Quarterly Report"? Do the revision dates reflect what appears to be conveyed in any and all reports?	Yes.
BMP Coordinator will schedule a meeting with the appropriate supervisor following the receipt of a written progress report when issues or progress are a concern.	Is this role of the BMP coordinator included in element 7, "Roles and Responsibilities"? Were meetings scheduled by the BMP Coordinator following receipt of the written progress report?	Yes.

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	14-2017-01	Audit Number:	01
Provide lead auditor first followed by auditor assistants along with classifications	Carrie Rivette – Wastewater / Stormwater Maintenance Superintendent		
Audit date(s)	March 28, 2017		
List nonconformances: 1. Nonconformance 2016-03 did not have report within 5 days and no written request for extension is in file. 2. Pam Ritsema is still listed in Element 6, although Tom Almonte's email is provided. 3. 4. 5. 6. 7.			
Comments:			

"I have conducted an internal audit of the BMP element noted above."

Lead Auditor (MM/DD/YYYY) 3/30/17 signature: Carrie Rivette

Joint review with BMP coordinator: (MM/DD/YYYY) 3/30/17 Initials: WRM

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Table 16.1.14 – Internal Auditor's Minimum Question Checklist

Table 10.1.14 – Internal Auditor's Minimum Question Checklist		Record audit number from worksheet: 14-2006-01
Requirement	Questions/Considerations	Auditor Notes
Develop and implement a procedure to investigate any noncompliance with applicable regulatory requirements and/or nonconformance with internal BMP procedures identified during routine monitoring and measurement or periodic internal BMP audits.	Show me the procedure you use to respond to nonconformance incidents?	Element 14
Develop and implement a procedure to identify the cause and take actions to correct the nonconformance.	What process is used to correct the nonconformance?	Procedure 3a.
Develop and implement a procedure to document the necessary corrective actions taken to prevent a recurrence.	How is nonconformance data tracked?	Nonconformance – Investigation committee report form
Develop corrective action plans to address non-conformances identified during routine monitoring and measurement and identify the nonconformance, the root cause(s), and the corrective action being taken. In the corrective action plans, identify changes to policies, programs, plans, operational controls and monitoring/measurement procedures to prevent future non-conformances.	Is a corrective action plan system in place? How does it work?	Yes – 3a ix BMP coordinator will provide information on the need for a CAP, resources needed to conduct an investigation of the issue and the requested completion date. The purpose of the corrective action plan is to layout a plan of action for investigating the root cause of an issue and implementing corrective actions to avoid a reoccurrence, and correct.
Establish formal corrective action plans to address finding of internal BMP audits and audits conducted by third parties. Document corrective action plans and describe what actions will be taken to address the audit findings, the individuals responsible, the estimated completion date, and required resources to develop and implement corrective and preventive action. Include recommended changes to policies, programs, plans, operational controls and monitoring/measurement procedures to prevent future non-conformances. Document these changes in the corrective action plan and in the BMP Manual and other relevant BMP documentation.	Is a corrective action plan system in place? How does it work?	See above.
Track progress in completing the corrective actions and periodically update to reflect completion.	How is progress tracked?	Monthly, by investigation committee.
(If a non-conformance has been identified) The non-conformance investigating committee will normally be given 5 days to conduct their investigation. The committee chair may request additional time by submitting a request to the BMP Coordinator.	(If a non-conformance has been identified) Was the non-conformance investigation completed in 5 days? If not, was a written request for a time extension given to the BMP Coordinator?	Nonconformance 2016-03 did not have report within 5 days and no written request for extension is in file.
(If a non-conformance has been identified) The preliminary non-conformance report shall include the date the non-conformance occurred, all committee meeting dates, personnel interviewed and date interview took place, root cause analysis report, supporting documentation, recommended corrective action, recommended system changes, other observations and date corrective actions took place.	(If a non-conformance has been identified) Are all of the criteria included in the report? Are all recommended changes incorporated in the appropriate policies and/or elements? Is committee chairs responsibilities outlined in "Role and Responsibilities"(element 7)?	Pam Ritsema's name is still in element 6, although Tom Almonte's email is listed.
The BMP Coordinator will review the findings of the committee, include summary information in the Biosolids Program Performance, report and review same with the Department Director during the last quarter of the calendar year. Any non-conformance issues will be resolved within 2 weeks or as soon as practical.	How is the BMP Coordinators review of the report with the committee and subsequent review with the Department Director documented? Was a summary of the non-conformance report included in the Biosolids Program Performance Report? Were the non-conformances resolved within the desired time frame? Were any affected training programs modified? Did retraining take place as needed? Are responsibilities outlines in "Roles and Responsibilities" (element 7)?	Cannot find documentation of director review. Program performance report for 2016 is not yet published, but previous reports have included summaries.

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	15-2017-01	Audit Number:	01
Provide lead auditor first followed by auditor assistants along with classifications	Carrie Rivette – Wastewater / Stormwater Maintenance Superintendent		
Audit date(s)	March 30, 2017		
List nonconformances: 1. No mention of management review in Periodic Biosolids Performance Program report. 2. No record of review with management found. 3. 4. 5. 6.			
Comments: Report was in general conformance with guidelines.			

"I have conducted an internal audit of the BMP element noted above."

Lead Auditor (MM/DD/YYYY) 3/30/17 signature: Carrie Rivette

Joint review with BMP coordinator: (MM/DD/YYYY) 3/30/17 Initials: WRH

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Table 16.1.15 -- Internal Auditor's Minimum Question Checklist

Element 15 Periodic Biosolids Program Performance Report		Record audit number from worksheet: 15-2006-01
Requirement	Questions/Considerations	Auditor Notes
Complete a periodic written Biosolids Management Program Performance Report (at least annually), summarizing the performance of the biosolids management program. The report shall contain appropriate summaries of monitoring, measurements data collected as part of the action plans and other results that demonstrate the performance of the biosolids program relative to its goals, objectives and legal requirements, including those biosolids management activities conducted by contractors. The report shall also provide summaries of performance relative to other voluntary adopted requirements, the organization's progress toward achieving its Biosolids program goals and objectives, and a summary of its independent third party BMP verification audit results.	Has a Biosolids management program performance report been completed? If so, review for inclusion of requirements. Does it include a summary of third party or interim audit?	Yes, for 2015. No summary of periodic management review of performance. Summary of 3 rd party audit included.
Make the periodic Biosolids Management Program Report available to employees, contractors, interested parties and the public. The organization shall have the flexibility of using other methods, including electronic methods such as a biosolids program web page, in addition to or in lieu of a written periodic performance report.	Has the report been made available to employees, contractors, interested parties and the public?	Yes.
The Biosolids Management Program Report will take place annually in the first quarter of the year. The Biosolids Management Program Report shall be performed by the BMP Coordinator with assistance from the BMP internal team.	Was the Biosolids Management Program Report written during the first quarter of the year?	Yes,
The Biosolids Management Program Report will be reviewed by the department director as part of the periodic management review during the first quarter of the year.	Was the Biosolids Management Program Report reviewed during the first quarter of the year during the periodic management review?	Unknown.
The final Biosolids Management Program Report shall be issued during the first quarter of the year.	Was the final Biosolids Management Program Report issued during the first quarter of the year?	Yes.

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	16-2017-01	Audit Number:	01
Provide lead auditor first followed by auditor assistants along with classifications	Carrie Rivette – Wastewater / Stormwater Maintenance Superintendent		
Audit date(s)	March 28, 2017		
List nonconformances: 1. 2. 3. 4. 5. 6. 7.			
Comments: While the audit is not complete, all assignments have been made appropriately and requirements of element 16 have been met.			

"I have conducted an internal audit of the BMP element noted above."

Lead Auditor (MM/DD/YYYY) 3/30/17 signature: Carrie Rivette

Joint review with BMP coordinator: (MM/DD/YYYY) 3/30/17 Initials: CR

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Table 16.1.16 – Internal Auditor's Minimum Question Checklist

Element 16 Internal BMP Audit		Record audit number from worksheet: 16-2006-01
Requirement	Questions/Considerations	Auditor Notes
Establish and maintain an internal audit program to periodically analyze the BMP for biosolids and determine whether it is effectively meeting its biosolids management policy, program requirements and biosolids program goals and objectives. The internal BMP audit program shall define the scope, frequency, and methodology of the audits, assign responsibility for conducting the audits and communicating their findings, and designate individuals to whom these findings are to be conveyed. The internal audit shall also evaluate the organization's performance relative to established biosolids program goals, objectives and performance measures. The internal BMP audit program shall cover all the organization's biosolids management program activities including those performed by contractors.	Has an internal audit program been implemented? How are findings communicated? Does it include contractor activities?	Findings are presented to committee and in performance report.
Report internal BMP audit results to the organization's management in a way that they can take action to make necessary modifications to the BMP and biosolids management program. The person responsible for the biosolids management program shall develop, or delegate the development of, a comprehensive corrective action plan addressing each nonconformance identified by the internal audit.	Is there a system in place to respond to issues identified during the internal audit process?	Yes.
Maintain, at a minimum, the following documents and records, as applicable, relating to its audit program: a) description of audit methodology, protocol, scope, and schedule; b) identification of lead auditor(s), qualifications, and description of roles and responsibilities of auditors, management representatives, and others that may participate in, review, or be expected to act upon the audit; and c) Corrective and/or preventive action plans prepared resulting from an audit, and any related changes made to policies, plans, procedures, and work practices that occur as a result of an audit's findings, evaluation, or follow-up actions.	Is the audit methodology identified? Is the audit schedule identified? Is the lead auditor identified? Are corrective action plans issued for non-conformances?	Upon completion of the audit, non-conformances will be issued and corrective action plans made, if applicable.
Internal audit will be conducted annually during the first quarter of the calendar year.	Has the internal audit been completed during the first quarter of the calendar year?	In process.
Each member of the City Internal BMP team will be responsible for auditing selected elements of the BMP. Internal BMP team members may assign responsibility to staff within their scope of authority once they have been trained as auditors.	Have all elements been assigned to a City Internal BMP team member? Are those responsibilities reflected in "Roles and Responsibilities" (element 7)? If team members have assigned responsibility to other staff members, have those persons been trained as auditors?	All elements have been assigned per element 7.
Each internal auditor will be trained and provided with an internal auditor's worksheet along with the minimum conformance requirements.	Were the auditors provided with an internal auditor's worksheet along with the minimum conformance requirements?	Yes.